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BY ECF

December 1, 2020

Honorable P. Kevin Castel United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Virgil Griffith</u>

20 Cr. 15 (PKC)

Dear Judge Castel:

We respectfully submit this letter motion on behalf of our client, defendant Virgil Griffith, to request: (1) a brief extension from Thursday December 3, until Tuesday, December 8, 2020, to file reply briefs in support of Mr. Griffith's three pending pretrial motions; and (2) permission to file a reply brief of up to 15 pages in support of the motion to dismiss (the other two replies will each be within the 10-page limit set by You Honor's individual practices).

The requested relief is necessary to permit counsel for Mr. Griffith adequately to respond to the points and authorities set forth in the government's 69-page consolidated opposition brief. The defense has been working diligently on the reply briefs, even over the Thanksgiving holiday weekend, but a small amount of additional time is needed. In view of the requested adjournment, Mr. Griffith, of course, has no objection if the Court adjourns the December 22, 2020 oral argument

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until a date convenient to the Court in early January 2021. The Court previously granted a brief extension of the motion schedule for the filing of the opening briefs and subsequent deadlines for the opposition and reply. (See Dkt. No. 61.)

We have conferred with counsel for the government who consent to the requested relief.

Respectfully submitted,

BE. E. We

Brian E. Klein

Keri Curtis Axel Baker Marquart LLP

-and-

Sean S. Buckley Kobre & Kim LLP

Attorneys for Virgil Griffith

cc: Government counsel of record (by ECF)